US ERA ARCHIVE DOCUMENT

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FILE OR REG. NO. 2596-62
PETITION OR EXP. PERMIT NO.
DATE DIV. RECEIVED June 22, 1990
DATE OF SUBMISSION April 2 and June 18, 1990
DATE SUBMISSION ACCEPTED
TYPE PRODUCT(S): (1), D, H, F, N, R, S
DATA ACCESSION NO(S). 415326-02; Record Number: 266656; Action Code: 305
PRODUCT MGR. NO. 15-LaRocca
PRODUCT NAME(S) Hartz® 2 in 18 Long Lasting Collar for Dogs
COMPANY NAME The Hartz Mountain Corporation
SUBMISSION PURPOSE Provide performance data obtained according to a
company devised protocol in support of claim for
kill of Lyme-disease-carrying deer tick on dogs.
CHEMICAL & FORMULATION Tetrachlervinphos: 2-chloro-1-(2,45-trichloro-phenyl) vinyl dimethyl phosphate 13.7%

(0.85 oz. 0.68 oz. & 1.15 oz. [24 g. 19 g & 33 g] net wt. impregnated material)

CONCLUSIONS & RECOMMENDATIONS The data presented in EPA Accession (MRID) Number 415326-03, having been obtained according to a company devised protocol which incorporates all essential requirements of § 95-9(a)(2) and (3) on p. 263 and meets the standard of § 95-9(b)(2)(i) on p. 264 of the Product Performance Guidelines, are adequate to support the claim for killing the effectiveness of the subject product when worn according to label directions. Similarly, the data presented in MRID No. 415326-01, having been obtained according to the same protocol incorporating the same requirements and meeting the same standard, are likewise adequate to support the claim for killing the deer tick by demonstrating the effectiveness of a collar nearly identical in formulation to the subject product when worn according to label directions. The data presented in MRID No. 415326-02, having been obtained according to a company devised protocol which incorporates most of the requirements of § 95-30(b)(11)1-45 a and 6-10 on pp. 280-4 of the Product Performance Guidelines are adequate to support the claim for killing deer tick on dogs when the subject collar is worn according to label directions, provided the following information is supplied for the record: 1) an unambiguous statement that the collar designated 8743 on pp. 4-8, 10, 13-14 and 17 is a placebo collar as required in § 95-30(b)(11)6-2; and 2) a statement that the formulation designated 8743 is not used in the manufacture of the subject collar supported by those data, since said famulation was totally interfective. Because of difficulty involved in collecting nymphal ticks from hosts, we will waive requirement for large dogs as stated in § 95-30(b)(11)6-7 on p. 282.